

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT  
OF OHIO**

KAYLA JANE,	)	CASE NO.: 1:16CV2195
	)	
Plaintiff	)	JUDGE: PATRICIA GAUGHAN
	)	
	)	
JEFFERY K. PATTERSON, et al.,	)	
	)	
Defendants	)	PLAINTIFF'S MOTION FOR
	)	LEAVE TO AMEND COMPLAINT
	)	INSTANTER
	)	

Now comes Plaintiff, Kayla Jane and moves for leave to amend her complaint *instante* for all the reasons contained in the attached Memorandum.

Respectfully submitted,  
/s/ Gregory C. Sassé  
Gregory C. Sassé  
2189 Professor Avenue  
Cleveland, Ohio 44113  
Counsel for Plaintiff Kayla Jane  
Ohio Bar # 0032539  
gregory.sasse@yahoo.com  
Telephone No: (216) 357-5900  
Facsimile No: (216) 357-2780

## MEMORANDUM

Counsel for Plaintiff received two motions for Judgments on the Pleadings within the last 21 days and drafted an amended complaint to clarify the duties each Defendant had breached with regard to the Plaintiff. Both motions assert claims of immunity. Typically, a district court affords plaintiffs an opportunity to amend a complaint once a qualified immunity defense is raised, demonstrating that the moving defendants have violated the plaintiff's constitutional rights. Cooper v. Parrish, 203 F.3d 937, 951 (6th Cir.2000). Additionally, Counsel for Plaintiff's work computer contracted a virus and was inoperable for four days. Counsel for Plaintiff's work computer has just been restored to operation, however, it is the 22<sup>nd</sup> day following the first motion for Judgment on the Pleadings. In the interest of Justice Plaintiff moves for leave to amend her complaint and to file a response to the motions. Amended complaint attached.

Wherefore, Plaintiff requests leave to amend her complaint instanter.

Respectfully submitted,

/s/ Gregory C. Sassé  
Gregory C. Sassé  
2189 Professor Avenue  
Cleveland, Ohio 44113  
Counsel for Plaintiff Kayla Jane

**CERTIFICATE OF SERVICE**

I hereby certify that on, December 23, 2016, a copy of the foregoing Motion of Plaintiff, was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Additional copies were sent by regular U.S. Mail to the following persons: Paige Fink, 9520 Detroit Avenue Cleveland, Ohio 44104. There is no current address or forwarding address for Pamela Reed.

Respectfully submitted,

/s/ Gregory C. Sassé

Gregory C. Sassé  
2189 Professor Avenue  
Cleveland, Ohio 44113  
Counsel for Plaintiff Kayla Jane